

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MICHAEL COHEN,

Plaintiff,

-against-

BEAN LLC, d/b/a FUSION GPS, and  
GLENN SIMPSON,

Defendants.

ORAL ARGUMENT REQUESTED

Case No. 1:18-cv-00183-JPO

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that, upon the Declaration of Shawn P. Naunton and the exhibits thereto, the accompanying Memorandum of Law, and all prior pleadings and proceedings heretofore had herein, Defendants Bean LLC, d/b/a Fusion GPS, and Glenn Simpson will move this Court, before the Honorable J. Paul Oetken, at the Thurgood Marshall United States Courthouse, 40 Foley Square, Courtroom 706, New York, New York 10007, at a date and time to be determined by the Court, for an order pursuant to Federal Rule of Civil Procedure 12(b)(6) dismissing the Complaint in its entirety.

Dated: March 30, 2018  
New York, New York

Respectfully submitted,

/s/ Shawn P. Naunton

Shawn P. Naunton  
ZUCKERMAN SPAEDER LLP  
485 Madison Avenue, 10<sup>th</sup> Floor  
New York, New York 10022  
Tel: (212) 704-9600  
Fax: (917) 261-5864  
snaunton@zuckerman.com

/s/ Steven M. Salky

William W. Taylor, III (pro hac vice motion pending)

Steven M. Salky (pro hac vice motion pending)

Rachel F. Cotton (pro hac vice motion pending)

Ezra B. Marcus (pro hac vice motion pending)

ZUCKERMAN SPAEDER LLP

1800 M Street, NW, Suite 1000

Washington, DC 20036

Tel: (202) 778-1800

Fax: (202) 822-8106

wtaylor@zuckerman.com

ssalky@zuckerman.com

rcotton@zuckerman.com

emarcus@zuckerman.com

*Counsel for Defendants*

*Bean LLC, d/b/a Fusion GPS, and*

*Glenn Simpson*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 30<sup>th</sup> day of March 2018, the foregoing was served on all counsel of record via CM/ECF.

/s/ Shawn P. Naunton